

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION

BRENDA DAVIS, et al.,	)	
Plaintiffs,	)	Case No.: 5:17-cv-06058-SJ-NKL
	)	
v.	)	
	)	ORAL ARGUMENT REQUESTED
BUCHANAN COUNTY, MISSOURI, et al.,	)	
Defendants.	)	

**DEFENDANTS DR. CATHERINE VAN VOORN, ANN SLAGLE, AND APRIL  
HELSEL'S MOTION TO DISMISS BASED ON QUALIFIED IMMUNITY**

COME NOW defendants Dr. Catherine Van Voorn, Ann Slagle, and April Helsel, by and through the undersigned counsel, and move this Court for an order dismissing plaintiffs' claims on the basis of qualified immunity. Defendants contemporaneously submit herewith their *Suggestions in Support* of this Motion to Dismiss.

WHEREFORE, defendants Dr. Catherine Van Voorn, Ann Slagle, and April Helsel respectfully request this Court grant their Motion to Dismiss Based on Qualified Immunity.

**NORRIS KEPLINGER  
HICKS & WELDER, LLC**

By: /s/ John Hicks  
John Hicks, [jh@nkfirm.com](mailto:jh@nkfirm.com), #53584  
Emily Tung, [etung@nkfirm.com](mailto:etung@nkfirm.com), #68177  
9225 Indian Creek Parkway, Suite 750  
Overland Park, Kansas 66210  
(913) 663-2000/(913) 663-2006 FAX  
ATTORNEYS FOR DEFENDANTS APRIL  
POWERS, ANN MARIE SLAGLE, CATHERINE  
VAN VOORN, ADVANCED CORRECTIONAL  
HEALTHCARE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of July, 2019, the above and foregoing document was filed and served on counsel of record via the Court's ECF system.

/s/ John Hicks

Attorney for Defendant Advanced Correctional  
Healthcare, Inc.